

# EXHIBIT B

IN THE CIRCUIT COURT OF ST CLAIR COUNTY  
STATE OF ILLINOIS

CARLA COX SMITH	)	
	)	
Plaintiff,	)	
	)	23LA0921
vs.	)	
	)	
BED BATH & BEYOND INC	)	
	)	
Defendant.	)	
	)	
Serve Registered Agent:	)	
	)	
C T CORPORATION SYSTEM	)	
208 SO LASALLE ST. STE 814	)	
CHICAGO, IL 60604-1101	)	

**COMPLAINT**

COME NOW Plaintiff, by and through the undersigned, and for their Complaint against Defendant, BED BATH & BEYOND states as follows:

1. Defendant owns/operates a retail chain identified as BED BATH & BEYOND located at 6611 N Illinois St., Fairview Heights, IL 62208 and Defendant is organized under the laws of the State of Illinois and doing business in the State of Illinois. At all times relevant herein, Defendant acted by and through its agents and employees.
2. The cause of action that is the subject of this Complaint arose in St Clair County, Illinois.
3. The amount in controversy exceeds \$50,000, exclusive of interest and costs.
4. Venue is appropriate in St Clair County, State of Illinois.
5. On May 12, 2022 Plaintiff was a business invitee of BED BATH & BEYOND at its Fairview Heights IL location.

6. While in an isle of BED BATH & BEYOND Plaintiff was hit by an employee driving a stocking buggy.

7. Defendant owed Plaintiffs a reasonable degree of care in maintaining their safety and security of the premises while under its control.

8. Defendant, by and through its agents and employees, breached the duty it owed Plaintiff in the following respects:

A) Defendant did not keep a careful lookout.

B) Defendant failed to warn or make safe a potentially dangerous condition,

9. As a direct and proximate result of Defendant's negligence, Plaintiff was caused to suffer injuries some requiring surgical intervention.

11. In addition to their injuries, the Plaintiff has endured pain and suffering, loss of enjoyment of life, past and future lost wages, and past and future medical expenses,

WHEREFORE, Plaintiff requests this Court to enter judgment in their favor and against the Defendant, and award them compensatory damages in an amount to be proven at trial to be fair and reasonable in excess of \$50,000; to award them prejudgment interest and the costs of this action, and to grant such other relief as the Court may deem necessary and proper.

Respectfully submitted:



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